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Before ~~ED~~ MAIL SECTION
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

JAN 27 1992

Federal Communications Commission
Office of the Secretary

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In the Matter of

Amendment of Part 97 of the
Commission's Rules governing the
Amateur Radio Services Regarding
Repeater and Auxiliary Operation
in the 1.25 Meter Band

REC-1

RM-7869
RM-7869

ORIGINAL
FILE

COMMENTS ON PETITION FOR RULE MAKING

The American Radio Relay League (ARRL) has filed a petition for rule making which would create a subband in the 222.000 - 222.150 MHz segment of the 222 - 225 MHz band which would not be available for auxiliary link operation. These comments seek to influence the Commission in its action taken on RM-7869, the subject petition.

The Northern California/Nevada DX Packet Spotting Network has attempted to follow generally accepted coordination practices in accordance with the self-regulating concept of the Amateur service. In addition, we have attempted to work with and through the ARRL in accomplishing needed coordinations. These comments offer a narrative of that attempt.

The "backbone" which ties the nodes in our network together was in the 220-222 MHz range which was recently removed from the Amateur Radio Service. When the Commission first proposed to remove those frequencies from the Amateur service, it also suggested in its proposal that it would be receptive to input from the Amateur community as to a revised band allocation plan with reference to repeaters and modes of operation. As a local survey showed support for the then existing ARRL "band plan" for 222 - 225 MHz, we contacted our ARRL Director and encouraged him to have the ARRL file at that time. We felt the ARRL should accept the Commission suggestion by asking that the ARRL band plan be enforced with

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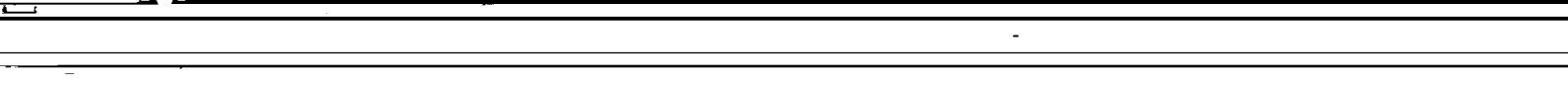



appropriate rules. However, we were persuaded by our ARRL Director that we should "cool it" as any indication that a contingency band plan proposal was even being considered by the ARRL would weaken the ARRL position in its dealings with the Commission at that time.

When it was apparent that we would lose our backbone

plan which would disenfranchise us from our 222.14 MHz auxiliary link frequency. Unfortunately, the ARRL has again not gathered full data on the present uses of a frequency range before it communicates with the Commission (Reference is made here to the ARRL's lack of knowledge of use of the 220-222 MHz range when it responded to the Commissions proposal to remove that frequency range from the Amateur Service). We would hope that the ARRL would quantify the numbers of Amateurs who would use the proposed 222.000-222.150 MHz segment, and exactly why 222.150 MHz should be the band segment edge rather than 222.100, 222.050, 222.125 or even 222.500 MHz.

We would hope the ARRL could explain why a new restriction should be added now, after all of the coordination activities, rather than prior to the extensive and expensive moves which have now taken place without their guidance. We are prepared to document with callsigns and dates of use over 1000 users of our DX Packet Spotting Network who utilize 222.140 MHz just here in Northern California/Nevada. We hope that the Commission would expect similar documentation from the ARRL to justify excluding us from that band segment. The ARRL did not ask us for any information on usage before it decided on the 222.150 MHz frequency. To the contrary, it rejected our requests for its action.

It appears that the ARRL proposal was prepared to counter a problem which exists in Southern California. A problem which perhaps would not have existed had the ARRL taken positive steps when it had the opportunity to do so. Now that a ~~problem exists in Southern California~~ we suggest that the




proposal or at least obtain additional information from them which documents the present occupancy of the entire 222-225 MHz band and supports their choice of the frequency 222.150 MHz as the demarcation point for Auxiliary links and repeaters.

Should you proceed with the ARRL proposal, we suggest that you consider a rule which would allow the use of Auxiliary links between 222.100 and 222.150 MHz, perhaps with a limitation of 200 watts transmitter output power. This would accommodate our present, coordinated use of this frequency range. We feel it is highly unlikely that the present users of 222 - 225 MHz in our area would feel compelled to move again to accommodate us, and we ask your consideration of our needs.

As an aside, our use of this unusual "knife-edge" path also contributes to the state of the art. If we are forced to vacate this frequency in favor of one which is higher in the band (we can't just move up to the next channel as it is the first of the coordinated FM voice repeater input frequencies), we will no doubt experience problems with overload from nearby strong transmitters. This is the same problem the ARRL seeks to mitigate with its proposal. We feel that our weak signal 24 hour/day use of this frequency is at least as important as the less frequent "weak signal" operations the ARRL seeks to protect.

Your consideration of our comments is appreciated.

Respectfully submitted,


1/19/92

Jay O'Brien
For himself and for the
Northern California/Nevada DX
Packet Spotting Network

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